

## **REMARKS**

Claims 1-9 stand rejected under 35 U.S.C. §102(b) as being anticipated by Keefe, Jr. (U.S. Patent No. 3,276,930). In response, Applicants amended independent claims 1 and 8 to clarify the features of the holding surfaces of the holding members, and respectfully traverse the rejection based on these amendments.

Independent claim 1 now includes the features of previous claims 4 and 5. Independent claim 8 includes the features of previous claim 9. Independent claims 1 and 8 also include the feature of each of the holding members having a pair of holding surfaces separated from each other in the width direction of the belt tread assembly, wherein the pair of holding surfaces are arranged at positions at which they abut against two ends of the belt tread assembly. Applicants respectfully submit that Keefe fails to disclose or suggest the above-described feature, and also the feature of the width of each of the dividing holding surfaces of each holding member being set to 5 to 30% of the width of the innermost laminated belt layer.

Keefe is directed to a tire fabrication process. In the outstanding Action on page 2, item 2, last paragraph, the Examiner indicates that the ribbed inner surface of parts 34, which correspond to the mold section 34, form divided holding members consistent with the claims. Applicants respectfully traverse this statement of the Examiner as it applies to the amended independent claims 1 and 8. Keefe provides no disclosure regarding the width of each of the divided holding surfaces of each holding member being set to 5 to 30% of a width of the innermost laminated belt layer.

In contrast, as discussed in paragraph [0023] of the present Application, a width  $W_1$  of each of the divided holding surfaces 8a and 8b shown in FIG. 3 of the present Application may be set to 5 to 30% of a width  $W_2$  of the innermost laminated belt layer 22. This range is provided to effectively prevent a separation failure caused by trapped air without impairing workability in pressure-bonding. If the width  $W_1$  is less than 5% of the width  $W_2$ , it becomes difficult to perform the operation of pressure-bonding of the primary green tire 11 and the belt tread assembly 21 to each other. On the other hand, if the width  $W_1$  exceeds 30% of the width  $W_2$ , the effect of preventing the separation failure caused by trapped air is reduced. Since Keefe provides no disclosure of this problem, Applicants respectfully submit that Keefe fails to disclose or suggest the range recited by Applicants. Additionally, Applicants respectfully submit that Keefe fails to disclose or suggest holding members having a pair of holding surfaces that are arranged to positions at which they abut against two ends of the belt tread assembly. For all these reasons, withdrawal of the §102(b) rejection of claims 1 and 8 is respectfully requested.

Claim 1 stands rejected under 35 U.S.C. §102(b) as being anticipated by Henley (U.S. Patent No. 3,475,254). Applicants respectfully traverse the rejection for the reasons recited above with respect to the §102(b) rejection based on Keefe.

Since claims 4 and 5 are added to claim 1, for at least this reason, the rejection is overcome. Additionally, the features of the holding surfaces being arranged to positions at which they abut against two ends of the belt tread assembly further distinguish the present invention over Henley. For all these reasons, withdrawal of the §102(b) rejection of claim 1 is respectfully requested.

Claims 8 and 9 stand rejected under 35 U.S.C. §102(b) as being anticipated by Kumagai et al. (U.S. Patent No. 4,584,050). Applicants respectfully traverse the rejection for the reasons recited above with respect to the §102(b) rejection based on Keefe.

FIGs. 4 and 5 of Kumagai show a ring segment 60 that has centering elements 84, 86. In the outstanding rejection, the Examiner asserts that the centering elements 84, 86 correspond to the holding surfaces of the present Application. Assuming *arguendo*, that the Examiner is correct, Applicants respectfully submit that Kumagai is silent regarding a width of the holding surfaces of each holding member being set to between 5 to 30% of the width of an innermost laminated belt layer. Since Kumagai is silent regarding this claimed range, withdrawal of the §102(b) rejection is requested for at least this reason.

Additionally, Applicants now clarify that each of the holding members has a pair of holding surfaces separated from each other in the width direction of the belt tread assembly, wherein the pair of holding surfaces are arranged to positions at which they abut against two ends of the belt tread assembly. Applicants respectfully submit that Kumagai also fails to disclose or suggest these features of amended claim 8. For this additional reason, withdrawal of the §102(b) rejection of claim 8 is respectfully requested.

Claims 6-9 stand rejected under 35 U.S.C. §102(b) as being anticipated by Holroyd et al. (U.S. Patent No. 5,201,975). Applicants respectfully traverse the rejection as it applies to amended claim 8 for the reason recited above with respect to the §102(b) rejection based on Keefe.

Holroyd is directed to a method of manufacturing a tire. As shown in FIGs. 2 and 2A, segments 7-10 are provided to form the tire. These segments have ribs 15 as shown in FIG. 2. However, Holroyd is silent regarding the above-described feature of the width of each of the divided holding surfaces of each holding member being set to 5 to 30% of a width of the innermost laminated belt layer. Additionally, Holroyd does not teach each of the holding members having a pair of holding surfaces separated from each in a width direction of the belt tread assembly, and wherein the pair of holding surfaces are arranged to positions at which they abut against two ends of the belt tread assembly. For these reasons, withdrawal of the §102(b) rejection of amended claim 8 is respectfully requested.

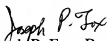
For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

If a Petition under 37 C.F.R. §1.136(a) for an extension of time for response is required to make the attached response timely, it is hereby petitioned under 37 C.F.R. §1.136(a) for an extension of time for response in the above-identified application for the period required to make the attached response timely. The Commissioner is hereby authorized to charge any additional fees which may be required to this Application under 37 C.F.R. §§1.16-1.17, or credit any overpayment, to Deposit Account No. 07-2069.

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